

04-1399-CD
WILLIAM G. SATTERLEE & SONS, INC. vs. JOHN M. BAKAYSA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 -1399 - CD
JOHN M. BAKAYSA, : COMPLAINT
Defendant :

Filed on Behalf of:
Plaintiff

Counsel of Record for
This Party:

Carl A. Belin, Jr., Esquire
PA I.D. #06805

BELIN & KUBISTA
15 North Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972 (PHONE)
(814) 765-9893 (FAX)

FILED *Attg pd. 85.00*
012:4651
SEP 09 2004 *1 CC shff*
2cc Attg
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
: No. 04 - - CD
vs. :
: JOHN M. BAKAYSA, :
: Defendant :
:

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830

(814) 765-2641 Ex 5982

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - - CD
JOHN M. BAKAYSA, :
Defendant :

COMPLAINT

1. That Plaintiff William G. Satterlee & Sons, Inc. is a Pennsylvania corporation with an office and place of business at 12475 Route 119, Rochester Mills, PA 15771 ("**Satterlee**").

2. That Defendant John M. Bakaysa is an individual who operates a gas station called B & B Service, situate on Route 36, in the Borough of Mahaffey, Pennsylvania 15757 ("**Bakaysa**").

3. That Bakaysa has purchased gas, diesel fuel, and other petroleum products from Satterlee under an open account.

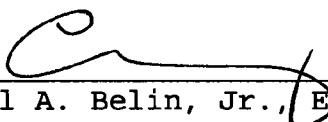
4. That Satterlee has delivered gas, diesel fuel, and other petroleum products to Bakaysa under the open account. A copy of the balance due as of August 30, 2004, is attached hereto as Exhibit "A."

5. That said charges made by Satterlee for the delivery of gas, diesel fuel, and other petroleum products were the reasonable and customary charges of Satterlee.

6. That Satterlee has demanded that Bakaysa pay the outstanding balance, which Bakaysa has failed and refused to pay.

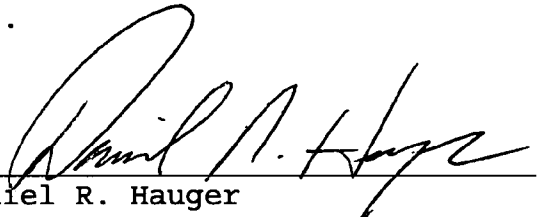
WHEREFORE, Satterlee demands judgment against Bakaysa for \$77,987.05, together with an interest at the rate of 1-1/2 percent per month or 18 percent per year.

BELIN & KUBISTA

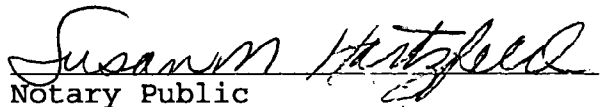
By 
Carl A. Belin, Jr., Esquire

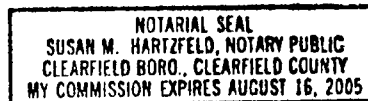
COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF Clearfield : SS.
:

Before me the undersigned officer, personally appeared DANIEL R. HAUGER, who deposes and says he is the Credit Manager of WILLIAM G. SATTERLEE & SONS, INC., and as such Credit Manager being authorized to do so, and being duly sworn according to law, deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.


Daniel R. Hauger

Sworn and subscribed before me this 9th day of September, 2004.


Notary Public



IN MODE RAKACU 2.0 WILLIAM G. SATTERLEE AND
 8/30/2004 Monday

Cust-Number...	3305	20-Cust type...	
-NAME.....		21-MTHLY-STMT..	YES
-NAME TGD....		22-FINANCE-CODE	YES
-BUS. NAME... B & B SERVICE	1-00	23-FINANCE-CHG.	
-ADDRESS L1.. P O BOX 11		24-SALESMAN....	16 FRED
-ADDRESS L2..		25-YTD-CHARGES.	198020.10
-CITY-STATE.. MAHAFFEY, PA		26-CASH-RECV...	17620.87
-ZIP-CODE.... 15757		27-INVOICE(Y,N)	YES
-PHONE#..... 277-6660	A/C: 814	28-PRICE-LEVEL.	1
-PHONE WORK..	A/C:	29-NAME-IND....	3 bus. name
-PHONE MOBILE	A/C:		
-SOC SEC #1..			
-SOC SEC #2.. UNITED CC			
-F.E.I.N.... 256-13-4343		*OLD BALANCE*	75215.80
-LAST-DELV'D. 08/27/2004	PAYMENT.08/26/2004	32-CURRENT BAL.	24495.75
-Notes..... INVOICE GAS & DIESEL SEPARATE		33-OVER-30-BAL.	29540.13
-CREDIT CARD#		34-OVER-60-BAL.	23951.17
- TYPE....		35-OVER-90-BAL.	
- EXP DATE		36-OVER-120-BAL	
- NAME....		*BALANCE-DUE*	77987.05
ENTER) next page :			
[Up] prev cust	[PgDn] next cust	[Esc] exit	[Ctrl-N] Notes

TOTAL P.02

Exhibit "A"

BELIN & KUBISTA

ATTORNEYS AT LAW

15 NORTH FRONT STREET

P. O. BOX 1

CLEARFIELD, PENNSYLVANIA 16830

In The Court of Common Pleas of Clearfield County, Pennsylvania

WILLIAM G. SATTERLEE & SONS, INC.

VS.

BAKAYSA, JOHN M.

COMPLAINT

Sheriff Docket #

16253

04-1399-CD

SHERIFF RETURNS

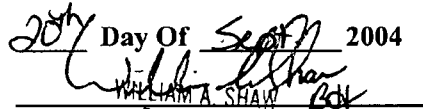
NOW SEPTEMBER 15, 2004 AT 9:08 AM SERVED THE WITHIN COMPLAINT ON JOHN M. BAKAYSA, DEFENDANT AT EMPLOYMENT, B&B SERVICE STATOIN, RT. 36, MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JOHN M. BAKAYSA A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: DAVIS/MORGILLO


Return Costs

Cost	Description
34.87	SHERIFF HAWKINS PAID BY: ATTY CK# 18248
10.00	SURCHARGE PAID BY: ATTY CK# 18249

Sworn to Before Me This

20th Day Of Sept 2004

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,


Chester A. Hawkins
Sheriff

FILED

SEP 20 2004

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - 1399 - CD
JOHN M. BAKAYSA, :
Defendant : PRAECIPE FOR ENTRY OF
JUDGMENT OF DEFAULT

Filed on Behalf of:
Plaintiff

Counsel of Record for
This Party:

Carl A. Belin, Jr., Esquire
PA I.D. #06805

BELIN & KUBISTA
15 North Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972 (PHONE)
(814) 765-9893 (FAX)

FILED

*9:10 am pr 20.00
Notice of Entry to Atty*
OCT 9 2004

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - 1399 - CD
JOHN M. BAKAYSA, :
Defendant :

PRAECIPE FOR ENTRY OF JUDGMENT OF DEFAULT


TO THE PROTHONOTARY:

Please enter judgment of default in favor of Plaintiff William G. Satterlee & Sons, Inc., and against Defendant, John M. Bakaysa, for failure to plead to the Complaint in this action within the required time. The Complaint contains a notice to defend within twenty (20) days from the date of service thereof. Defendant was served with the Complaint on September 15, 2004, and his answer was due to be filed on October 5, 2004.

Attached as Exhibit "A" is a copy of Plaintiff's written Notice of Intention to File Praecipe for Entry of Default Judgment which I certify was mailed by regular mail to the Defendant at his last known addresses on October 6, 2004, which is at least ten (10) days prior to the filing of this Praecipe.

Please assess damages against Defendant John M. Bakaysa in the amount of \$77,987.05 together with interest at the rate of one and one-half (1-1/2%) per cent per month or eighteen (18%) per cent per year from September 9, 2004, being the amounts demanded in the Complaint.

BELIN & KUBISTA

By 
Carl A. Belin, Jr. Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - 1399 - CD
JOHN M. BAKAYSA, :
Defendant :

NOTICE

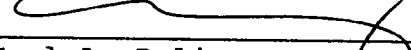
To: John M. Bakaysa
B&B Service Station
Route 36
Mahaffey, PA 15757

DATE: **October 6, 2004**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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1 North Second Street
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BELIN & KUBISTA

By 
Carl A. Belin, Jr., Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - 1399 - CD
JOHN M. BAKAYSA, :
Defendant :

Notice is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$77,987.05 together with interest at the rate of one and one-half (1-1/2%) per cent per month or eighteen (18%) per year, plus interest, attorneys fees and costs on _____, 2004.

Prothonotary,

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,
PENNSYLVANIA
STATEMENT OF JUDGMENT

William G. Satterlee & Sons, Inc.
Plaintiff(s)

No.: 2004-01399-CD

Real Debt: \$77,987.05

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

John M. Bakaysa
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 19, 2004

Expires: October 19, 2009

Certified from the record this 19th day of October, 2004

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment, Debt,
Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - 1399 - CD
JOHN M. BAKAYSA, :
Defendant : PRAECIPE TO SATISFY
JUDGMENT

Filed on Behalf of:
Plaintiff

Counsel of Record for
This Party:

Carl A. Belin, Jr., Esquire
PA I.D. #06805

BELIN & KUBISTA
15 North Front Street
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(814) 765-8972 (PHONE)
(814) 765-9893 (FAX)

FILED
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AUG 03 2005
William A. Shaw
Prothonotary/Clerk of Courts
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Amy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

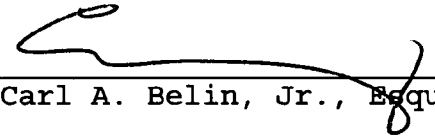
WILLIAM G. SATTERLEE & SONS, INC., :
Plaintiff :
vs. : No. 04 - 1399 - CD
JOHN M. BAKAYSA, :
Defendant :

PRAECIPE

TO THE PROTHONOTARY:

Please mark the judgment entered in the above-captioned
action on October 19, 2004, in the amount of \$77,987.05
satisfied.

BELIN & KUBISTA




Carl A. Belin, Jr., Esquire

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

 COPY

CERTIFICATE OF SATISFACTION OF JUDGMENT

William G. Satterlee & Sons, Inc.

No.: 2004-01399-CD

Vs.

Debt: \$77,987.05

John M. Bakaysa

Atty's Comm.:

Interest From:

Cost: \$7.00

NOW, Wednesday, August 03, 2005 , directions for satisfaction having been received,
and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 3rd day of August, A.D. 2005.

Prothonotary